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RACHEL PERILLO

December 8, 2023

Honorable Colleen McMahon
United States District Judge for
the Southern District of New York
500 Pearl Street
New York, New York 11201

Re: *United States v. Ebisawa*, 22 Cr. 256 (CM)

Dear Judge McMahon,

With consent of the government and on behalf of counsel for all defendants, we write to request a 60-day continuance of the December 14, 2023, status conference in this case. The defendants and their counsel continue to review the voluminous Rule 16 discovery, the review of which is made difficult by the need for Thai interpreters. Each defense counsel is also engaged with the government on possible pretrial dispositions.

To that end, should the Court grant this request, we ask that the time between December 13, 2023, and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161 (h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial, because it will allow the government and counsel for each defendant to continue discussions regarding a possible disposition in the matter, or in the alternative prepare for trial.

We all thank the court for its time and consideration of this matter.

Respectfully submitted,

/s/David Stern & Sabrina Shroff
Attorneys for Somphop Singhasiri